

BILLY J. WILLIAMS, OSB #901366
United States Attorney
District of Oregon
GEOFFREY A. BARROW
Assistant United States Attorney
Geoffrey.barrow@usdoj.gov
1000 SW Third Avenue, Suite 600
Portland, OR 97204-2902
Telephone: (503) 727-1000
Attorneys for United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA

3:20-cr-00506-HZ

v.

**UNOPPOSED MOTION FOR
PROTECTIVE ORDER**

HAWAZEN SAMEER MOTHAFAR,

Defendant.

The United States of America respectfully moves this Court for an order limiting the copying and dissemination of certain materials set forth below. Defendant's counsel does not object to this motion. In the interest of providing timely discovery to the defendant, the government respectfully requests that the Court enter the accompanying Protective Order.

The discovery material in the case includes highly sensitive information, including personal and financial information, and information regarding the government's confidential sources. Due to the large volume of discovery material, the frequency with which the sensitive

information appears throughout the documents, and the nature of the violations charged in this case, redaction of all discovery is not a feasible option.

As such, the government respectfully requests that the Court order that defendant's counsel shall not provide copies of the discovery material produced by the government to defendant which contains personal information, financial information, confidential source information, or sealed information defined as follows:

(a) personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, or professional license number ("Personal Information") unless it belongs to the defendant;

(b) financial information of any individual or business, including without limitation, bank account numbers, credit or debit card numbers, account passwords, account names and contact information, account history, account balances, account statements, tax return information, or taxpayer identification numbers ("Financial Information") unless it belongs to the defendant;

(c) information regarding the government's confidential source(s) or source(s) of information, including criminal histories, arrest records and summaries of information provided to the government, and any information that establishes identity ("Confidential Source Information"); or

(d) the contents of any sealed documents, to include search warrant applications and their contents (e.g., affidavits, orders) and other court-ordered authorizations (e.g., pen registers, geolocation orders, tracking orders) ("Sealed Information");

unless the Personal Information, Financial Information, and Confidential Source Information mentioned in each of these subparagraphs, has first been redacted from the discovery materials.

The government further moves the Court to order that defendant's counsel and defendant neither share any discovery material produced by the government with others not involved in case-related activities nor make any public disclosure of the same, without the government's express written permission, except that defense counsel may provide discovery materials to those persons employed by defense counsel or those defense counsel deems necessary to assist counsel for trial or other proceedings.

These restrictions should not hinder defendant's ability to prepare for trial and will protect others from potential harassment or exposure to misuse of their personal and financial information. Defense counsel is free to raise any issues regarding this protective order during the course of this litigation should this order impact counsel's representation of defendant.

For the foregoing reasons, the government respectfully requests that the Court enter the proposed Protective Order.

Dated: December 4, 2020

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

/s/ Geoffrey A. Barrow
GEOFFREY A. BARROW
Assistant United States Attorney